



18 December 2015

Holly Roberson, Land Use Counsel
Governor's Office of Planning and Research
1400 10th Street
Sacramento, CA 95814

RE: Public Comment on Draft Sample Environmental Checklist Form Questions Regarding Tribal Cultural Resources in Appendix G of the CEQA Guidelines in Accordance with AB 52

Dear Ms. Roberson,

My name is Colin Rambo, and I was hired by the Tejon Indian Tribe ("Tejon") for the purpose of establishing their Tribal Historic Preservation Office ("THPO"). Further, Tejon's Chairperson, Kathryn Montes Morgan, has delegated to me the authority to represent Tejon in any tribal consultation concerning cultural resources.

Thank you for your letter, dated 1 December 2015, inviting Tejon to comment on the draft sample environmental checklist form questions regarding Tribal Cultural Resources ("TCRs") in Appendix G of the California Environmental Quality Act ("CEQA") Guidelines, in Accordance with California State Assembly Bill 52 ("AB 52").

Before we comment on the proposed draft changes, we would like to formally request more lead time on invitations to participate in any future webinars or other meetings related to AB 52 and TCRs during the formal rulemaking process because we did not receive the invitation to participate in the December 10th webinar until 9 December 2015 (i.e. the date we received your letter). Also, please add my email address (listed below my signature line) to any mass-correspondence lists you may have for future announcements related to AB 52 and TCRs. That said, Tejon would like to thank your office for its extensive outreach efforts with Native Californian tribes during the implementation of AB 52. Moreover, Tejon greatly benefited from the *Discussion Draft Technical Advisory: AB 52 and Tribal Cultural Resources in CEQA* (May 2015) and the associated public comments posted on your website.

It is the opinion of Tejon that of the three alternatives proposed for the update to the CEQA Initial Study checklist, Alternative 3 is the only version that *truly* captures the spirit and *fully* implements the legislative intent of AB 52, which is to ensure that tribal cultural values (as expressed by tribes, *not* cultural resource management professionals, during consultation with lead agencies) are considered in the evaluation of TCRs contained within CEQA documents. Tejon believes that the inclusion of a new and discrete section in the Initial Study Checklist is the *only* way to emphasize the importance of tribal consultation and the consideration of tribal values in the CEQA review process for lead agencies and the general public; it is Tejon's opinion that anything less would fall short of satisfying the legislative intent of AB 52.



Subsequently, Tejon believes that the language and format of Alternative 3 is appropriate, and Tejon has no further suggestions for improving Alternative 3 at this time.

Tejon looks forward to working with your office and the Natural Resources Agency during the formal rulemaking process. If you have any questions regarding the comments included in this letter, please feel free to contact me.

Respectfully,

A handwritten signature in black ink, appearing to read "Colin Rambo". The signature is written in a cursive, flowing style.

Colin Rambo, B.A.
Tribal Historic Preservation Technician
Tejon Indian Tribe
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